

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

NONE to CV

BRETT T. CULVER

Plaintiff,

v.

COMMONWEALTH OF PENNSYLVANIA,
et al.,

AND AMENDED DEFENDANTS'

Michael Vuksta,
S. Nye,
Edward Klem,
W.P. Yackel
D.J. Jones

Defendants.

ORIGINAL

AMENDED DEFENDANTS'

Case No. 1:cv-01-0904

(Judge Kane)

FILED
HARRISBURG, PA

JUL 15 2003

MARY E. D'ANDREA, CLERK
PER 5/8 DEPUTY CLERK

AMENDED ADDITIONAL DEFENDANTS'

This is a civil rights action brought by this plaintiff pursuant to 42 U.S.C. § 1983 charging defendants' of violations they committed against this plaintiff and his Constitutional Rights. Defendants' have violated this plaintiff's First, Fourth, Eighth, and Fourteenth Amendments to the United States Constitution. Staff members of the SCI Mahanoy facility "have, and "continue to accost this plaintiff with retaliatory abuses, as this plaintiff continues to be subjugated to the care and custody of the SCI Mahanoy Administration and defendants'. Pursuant to this Courts refusal to secure protection for this plaintiff from ongoing abuses by the defendants' and staff of the SCI Mahanoy facility, this plaintiff is continuously subjected to ongoing abuses and adverse retaliatory treatments by the SCI Mahanoy staff.

Pursuant to the afore mentioned ongoing SCI Mahanoy staff abuses/retaliations against this inmate, the additional cited employees; Michael Vuksta, S. Nye, E. Klem, W.P. Yackel, and D.J. Jones, of the SCI Mahanoy facility are being entered as defendants' in civil action 01-cv-01-0904.

These additional defendants' amended to 01-cv-01-0904 have been cited for retaliatory attacks against this plaintiff pursuant to relevant ongoing abuses/attacks perpetrated against this plaintiff by SCI Mahanoy staff.

W.P. Yackel, who is employed by the SCI Mahanoy facility as a Security Officer, in concert with E. Klem, Vincent Mooney, M. Vuksta, S. Nye, and D.J. Jones, has retaliated against this plaintiff by accosting him with fraudulent misconduct allegations/charges on 6-25-03 (#440634). The false charges were a direct retaliatory action taken by Yackel pursuant to plaintiff's 5-23-03 and 6-19-03 reports of staff abuses submitted to E. Klem. W.P. Yackel, in concert with V. Mooney, M. Vuksta, and S. Nye, accosted this plaintiff with unfounded unfactual formulated charges in misconduct #440634. W.P. Yackel has committed violations of this plaintiff's Eighth and Fourteenth Amendment Rights.

Michael Vuksta, who is employed by the SCI Mahanoy facility has used his position and authority to commit acts of abuse against this plaintiff, and has conspired/collaborated with Nye, Yackel, and other staff to falsely accuse/accost this plaintiff of false charges to unjustly sanction/punish this plaintiff. Michael Vuksta has committed violations of this plaintiff's Eighth and Fourteenth Amendment Rights.

S. Nye, who is employed by the SCI Mahanoy facility as a unit Counselor, has used her position and authority to conspire/collaborate in false allegations and record file responses in efforts to accost this plaintiff with misrepresentations, slandering of this plaintiff, including giving false information against this plaintiff to officials (and on file). Nye has collaborated efforts with other violating staff members of the SCI Mahanoy Administration to accost this plaintiff with false charges/sanctions of 6-25-03 (with Vuksta and Yackel), and 6-30-03 (with D.J. Jones). S. Nye has committed violations of this plaintiff's Eighth and Fourteenth Amendment Rights.

D.J. Jones, who is employed by the SCI Mahanoy facility as a Hearing Examiner, compromised his position and authority to unjustly sanction this plaintiff on unsupported false charges, in collaboration to retaliate against this plaintiff for reporting staff misconduct/abuse. In conjunction with W.P. Yackel, Nye, Vuksta, Mooney, and Klem, D.J. Jones accosted this plaintiff with sanctions via misconduct #440634 on 6-30-03, without evidence support, and through falsification of witness testimony, which D.J. Jones himself falsified on record. D.J. Jones has committed violations of this plaintiff's Eighth and Fourteenth Amendment Rights.

D.J. Jones desisted from performing duties of fact finding and fair/impartial hearing. D.J. Jones falsified witness testimony of C.O. Cope to wrongfully enter falsified support of allegations, and a unsupported guilty verdict against this plaintiff (by intentionally and purposely entering a fabricated version of C.O. Cope's testimony on record). D.J. Jones has committed crimes of Official Corruption, Falsification of Official Documents, Falsification of Witness Testimony, and Assault against this plaintiff, in conjunction and collaborations with defendants' Klem, Yackel, Mooney, Vuksta, and Nye.

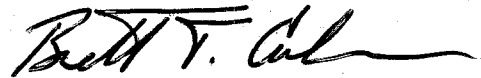
CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the forgoing "AMENDED ADDITIONAL DEFENDANTS" was sent, this date of 7-12-03, by First Class United States Mail to:

U.S. District Court
Clerk of Courts
228 Walnut Street
P.O. Box 983
Harrisburg, PA. 17108

Defendants in care of
Office of Attorney General
Maryanne Lewis
Strawberry Square
Harrisburg, Pa. 17120

Date: July 12, 2003



Brett T. Culver